

## REMARKS

This application has been reviewed in light of the Office Action dated May 6, 2006. Claims 31-37 are presented for examination, of which Claims 31 and 34 are in independent form. Claims 31 and 34 have been amended to define still more clearly what Applicant regards as his invention.

Claims 31 and 33-37 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,930,722 (Nakamura). Claim 32 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Nakamura in view of U.S. Patent No. 5,892,541 (Merrill).

As shown above, Applicant has amended independent Claims 31 and 34 in terms that more clearly define what he regards as his invention. Applicant submits that these amended independent claims, together with the remaining claims dependent thereon, are patentably distinct from the cited prior art for at least the following reasons.

Claim 31 is directed to a method of driving a solid image pickup device having a photoelectric conversion unit, a charge-voltage conversion unit for converting electric charges from the photoelectric conversion unit into voltage signals, a signal amplification means for amplifying the voltage signals generated in the charge-voltage conversion unit, a charge transfer means for transferring photoelectric charges from the photoelectric conversion unit to the charge-voltage conversion unit, and a selecting means for reading out a signal amplified by the signal amplification means to a signal line. The method includes: (1) a first transferring step of transferring the electric charges of the photoelectric conversion unit to the charge-voltage conversion unit; (2) a first selecting step of reading out a first signal to a signal line by the selecting means; (3) a reset step of resetting the charge-voltage conversion unit after the first

signal is read out; (4) a second transferring step of transferring the electric charges of the photoelectric conversion unit to the charge-voltage conversion unit; (5) a second selecting step of reading out a second signal to the signal line by the selecting means; and (6) an adding step of adding the first signal and the second signal read out to the signal line.

Among other notable features of Claim 31 are: (1) a first selecting step of reading out a first signal to a signal line by the selecting means; (2) a second selecting step of reading out a second signal to the signal line by the selecting means; and (3) an adding step of adding the first signal and the second signal read out to the signal line.

Nakamura relates to an image pickup apparatus including an array of unit cells, each unit cell having a light receiving device for receiving light and generating an electric charge corresponding to the light, a charge accumulating section for accumulating the electric charge generated by the light receiving device, a transfer device for transferring the electric charge from the light receiving device to the charge accumulating section, and a charge limiting device for limiting the electric charge in the charge accumulating section. The image pickup device also includes vertical signal lines for receiving electric data corresponding to the electric charge accumulated in the charge accumulating section of its corresponding unit cell and a control circuit. Nakamura discusses that the control circuit causes the charge limiting device to limit the charge generated by the light receiving device during a first period and transferred to the charge accumulating section through the transfer device and, adding, to the electric charge accumulated in the charge accumulating section, the charge generated by the light receiving device during a second period following the first period and transferred to the charge accumulating section through the transfer device. However, nothing has been found in Nakamura that would teach or

suggest “a first selecting step of reading out a first signal to a signal line by the selecting means,” “a second selecting step of reading out a second signal to the signal line by the selecting means,” and “an adding step of adding the first signal and the second signal read out to the signal line,” as recited in Claim 31.

A review of the other art of record has failed to reveal anything which, in Applicant’s opinion, would remedy the deficiencies of the art discussed above, as a reference against Claim 31.

Independent Claim 34 recites features similar to those discussed above with respect to Claim 34 and therefore are also believed to be patentable over the cited prior art for the reasons discussed above.

The other claims in this application are each dependent from one or another of the independent claims discussed above and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

Early and favorable continued examination of the present application is respectfully requested.

Applicant's undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

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